

EXHIBIT J

ROBERT SEIBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

DARCY M. BLACK,

Plaintiff,

-vs-

BUFFALO MEAT SERVICE, INC., doing business
as BOULEVARD BLACK ANGUS, also known as
BLACK ANGUS MEATS, also known as
BLACK ANGUS MEATS & SEAFOOD,
ROBERT SEIBERT,
DIANE SEIBERT,
KEEGAN ROBERTS,

Defendants.

Examination Before Trial of

ROBERT SEIBERT, Defendant, taken pursuant to the Federal
Rules of Civil Procedure, in the law offices of GRECO
TRAPP, PLLC, 1700 Rand Building, 14 Lafayette Square,
Buffalo, New York, taken on January 10, 2018, commencing at
9:30 A.M., before ERIN L. COPPING, Notary Public.

1 A. Inappropriate.

2 Q. Okay. And would you agree with me that that
3 statement would be discriminatory?

4 A. Yes.

5 Q. Okay. And were you ever aware of Sean Round
6 telling Raelean Rush and/or Regina Rush that
7 African-American boyfriend was using her for her
8 name because Black men always cheat and he
9 probably has a lot of girlfriends?

10 A. Was I aware of that?

11 Q. Yes.

12 A. No.

13 Q. Did anyone ever -- did you ever learn that anyone
14 referred to Darcy Black's children as niggers?

15 A. No.

16 Q. Did anyone ever complain to you that anyone
17 referred to Darcy Black's children as niggers?

18 A. To me personally, no.

19 Q. Yes. Did Darcy Black ever complain to you that a
20 male employee -- a Caucasian male employee
21 referred to her children as niggers?

22 A. No.

23 Q. Would it ever be appropriate to refer to an